

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

IN RE PAYLESS SHOESOURCE, INC., <i>et al.</i> ¹)	
)	Case No. 17-42257
)	
)	Chapter 11
Debtors.)	
<hr style="width: 40%; margin-left: 0;"/>)	(Joint Administration Requested)

ENTRY OF APPEARANCE AND REQUEST FOR NOTICE

PLEASE TAKE NOTICE that the undersigned appears on behalf of (a) PLP, S.A., (b) South America Local Partners, S.A., (c) Pataya, Inc., and (d) Bluestone Financial, Inc. (together, the “Appearing Parties”), and pursuant to Rules 9010 and 2002 of the Rules of Bankruptcy Procedure requests that all notices given or required in this case, and all documents, and all other papers served in this case, be given and served upon:

Lisa A. Epps
Spencer Fane LLP
1000 Walnut St., Suite 1400
Kansas City, Missouri 64106
lepps@spencerfane.com

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers referred to in the above-mentioned Bankruptcy Rules, but also includes, without limitation, all orders and notices of applications, motions, petitions, pleadings, requests, complaints, schedules, statements of financial affairs, and demands.

¹ The Debtors in these cases are: Payless Holdings LLC [5704]; Payless Intermediate Holdings LLC [N/A]; WBG-PSS Holdings LLC [N/A]; Payless Inc. [3160]; Payless Finance, Inc. [2101]; Collective Brands Services, Inc. [7266]; PSS Delaware Company 4, Inc. [1466]; Shoe Sourcing, Inc. [4075]; Payless ShoeSource, Inc. [4097]; Eastborough, Inc. [2803]; Payless Purchasing Services, Inc. [3043]; Payless ShoeSource Merchandising, Inc. [0946]; Payless Gold Value CO, Inc. [3581]; Payless ShoeSource Distribution, Inc. [0944]; Payless ShoeSource Worldwide, Inc. [6884]; Payless NYC, Inc. [4126]; Payless ShoeSource of Puerto Rico, Inc. [9017]; Payless Collective GP, LLC [N/A]; Collective Licensing, LP [1256]; Collective Licensing International LLC [5451]; Clinch, LLC [9836]; Collective Brands Franchising Services, LLC [3636]; Payless International Franchising, LLC [6448]; Collective Brands Logistics, Limited [6466]; Dynamic Assets Limited [1978]; PSS Canada, Inc. [4969]; Payless ShoeSource Canada Inc. [4180]; Payless ShoeSource Canada GP Inc. [4182] and Payless ShoeSource Canada LP [4179].

PLEASE TAKE FURTHER NOTICE that this request pursuant to Fed. R. Bankr. P. 2002 shall not be deemed or construed to be a waiver of any substantive or procedural rights of the Appearing Parties including without limitation to: (a) require that where any adversary proceeding is to be initiated against the Appearing Parties in this or any related cases or where any proceeding is to be initiated by complaint against the Appearing Parties under applicable non-bankruptcy law, service shall be made on the Appearing Parties in accordance with the applicable Federal Rules of Civil Procedure and applicable non-bankruptcy law; (b) to have final orders in non-core matters entered only after *de novo* review by the district court; (c) a trial by jury in any proceeding so triable in this case or any case, controversy or proceeding related to this case; (d) have the district court withdraw the reference in any manner subject to mandatory or discretionary withdrawal; or (e) any other rights, claims, actions, defenses, setoffs or recoupments to which the Appearing Parties are or may be entitled at law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments the Appearing Parties expressly reserve.

Dated: Saint Louis, Missouri
April 4, 2017

Respectfully submitted,

/s/ Lisa A. Epps

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Counsel for the Appearing Parties

CERTIFICATE OF SERVICE

The undersigned certifies that on this 4th day of April, 2017, a true and correct copy of the foregoing was served on all counsel of record *via* the Court's ECF system, with notice of case activity generated. In addition, on the same date, a copy was deposited in the U.S. Mail, first-class mail pre-paid to the Office of the United States Trustee as follows:

U.S. Trustee
Office of U.S. Trustee
111 S. Tenth St., Ste. 6.353
St. Louis, MO 63102

/s/ Lisa A. Epps
An Attorney for the Appearing Parties